

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: DRAFT

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100810
Inspector's Name: Robert Barker
Date of Last Inspection: 12/14/2017
Compliance Code: 3 / Compliance - inspection

<p align="center">Facility Data</p> <p>Applicant (Facility's Name): Thomas Built Buses - Fairfield Road</p> <p>Facility Address: Thomas Built Buses - Fairfield Road 715 West Fairfield Road High Point, NC 27263</p> <p>SIC: 3713 / Truck And Bus Bodies NAICS: 336211 / Motor Vehicle Body Manufacturing</p> <p>Facility Classification: Before: Title V After: Fee Classification: Before: Title V After:</p>				<p align="center">Permit Applicability (this application only)</p> <p>SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>																																																			
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<p>Review Engineer: Jenny Sheppard</p> <p>Review Engineer's Signature: _____ Date: DRAFT</p>				<p align="center">Comments / Recommendations:</p> <p>Issue 05727/T17 Permit Issue Date: DRAFT Permit Expiration Date:</p>																																																			

1. Purpose of Application:

This permit modification is a renewal of an existing Title V permit for Thomas Built Buses, Inc – Fairfield Road. The existing Title V permit number **05727T16** was issued on March 30, 2011, and was scheduled to expire on February 28, 2016. The renewal application was postmarked/received on May 26, 2015, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied pursuant to 2Q .0513.

2. Facility Description

Thomas Built Buses - Fairfield Road (TBB – Fairfield Road) operates a bus manufacturing facility.

3. History/Background/Application Chronology

March 30, 2011 – Permit 05727T16, TV Renewal.

May 26, 2015 – Permit renewal request received.

June 27, 2017 – Site visit, discussed renewal concerns. Requested formal documentation for the removal of the toxics conditions, changes to the insignificant activities list, and removal of emission sources.

September 1, 2017 – Renewal application update received.

4. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page(s)	Section	Description of Change(s)
1	Permit Cover Page	Amend permit revision numbers and issuance.
	Insignificant Activities List	Added the infrared heaters, Air Make-up units for the entire facility and the air handling units from Plant 9 that is now warehouse space to the Insignificant Activities list
3	Section 1, Table	Update permit number in page header, added MACT 5D ref and corrected capacity for boiler ESB-1, removed all permitted equipment for Plant 9, move ES-AMU2 and ES-AMU5 to the insignificant activities list, and added page numbers for equipment. Removed 02D .0958 requirements, 02D .1100, 02Q .0711, and 02Q .0705. Update condition references to reflect renumbering of conditions. Corrected format of conditions 2.1 A.6 and 7.
5-23	Section 2.1.	Update testing and reporting conditions and all other conditions to current language. Removed Plant 9 equipment from 2.1 A. Added MACT 5D condition in Section 2.1 B
24-32	Section 3	Update General Conditions with the most recent revision
33	List of Acronyms	Updated the list of Acronyms to current
TVEE/ESM	Equipment list and ES-1	Added MACT 5D to ESB-1 in TVEE. Enddated Plant 9 manufacturing equipment from the permit

5. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 02D .0503, Particulates from Fuel Burning Indirect Heat Exchangers

15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes

15A NCAC 02D .0516, Sulfur Dioxide Emissions from Combustion Sources

15A NCAC 02D .0521, Control of Visible Emissions

15A NCAC 02D .0958, Work Practices for Sources of Volatile Organic Compounds (removed, not in applicable area)

15A NCAC 02D .1100, Toxic Air Pollutant Emissions Limitation and Requirement (removed, facility requested)

15A NCAC 02Q .0705, Existing Facilities and SIC Calls (removed, repealed)

15A NCAC 02Q .0711, Emission Rates Requiring a Permit (removed, facility requested)

15A NCAC 02D .1111, Maximum Achievable Control Technology (40 CFR 63, Subparts PPPP, MMMM, ZZZZ, and DDDDD)

15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions

15A NCAC 02Q .0317, Avoidance Conditions (15A NCAC 2D .0530, Prevention of Significant Deterioration, VOC)

A regulatory review for these current permit conditions will not be included in this document except for 40 CFR 63, Subpart DDDDD (added at this renewal). Where applicable, the permit conditions have been modified to reflect current working shell conditions.

15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

Applicability

- a. For this existing source (ID No. ESB-1) designed to burn gas 1 fuels with a heat input capacity greater than 5 million Btu per hour and less than 10 million Btu per hour, the Permittee shall comply with all applicable provisions, including the monitoring, recordkeeping, and reporting contained in Environmental Management Commission Standard 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (MACT) as promulgated in 40 CFR 63, Subpart DDDDD "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters" and Subpart A "General Provisions."
- i. The Permittee shall comply with the CAA §112(j) standard through May 19, 2019. The Permittee shall be subject to the requirements of this standard starting May 20, 2019. Note that the requirements of this standard may require action on behalf of the Permittee prior to May 20, 2019.

Definitions and Nomenclature

- b. For the purpose of this permit condition, the definitions and nomenclature contained in 40 CFR 63.7575 shall apply.

General Provisions

- c. The Permittee shall comply with the requirements of 40 CFR 63 Subpart A General Provisions according to the applicability of Subpart A to such sources as identified in Table 10 to 40 CFR Part 63, Subpart DDDDD.

Compliance Date

- d. The Permittee shall complete the initial tune up and the one-time energy assessment no later than May 20, 2019.

Notifications

- e. The Permittee shall submit a Notification of Compliance Status to the DAQ. The notification must be signed by a responsible official and submitted by July 19, 2019. The notification shall contain the following:
 - i. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, and description of the fuel(s) burned.
 - ii. the following certification(s) of compliance, as applicable:
 - (A) "This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR 63 Subpart DDDDD at the site according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi)"; and
 - (B) "This facility has had an energy assessment performed according to 40 CFR 63.7530(e)" [i.e., paragraph h. below] and is an accurate depiction of the facility at the time of the assessment, or that the maximum number of on-site technical hours specified in the definition of energy assessment applicable to the facility has been expended.

General Compliance Requirements

- f. The Permittee shall be in compliance with the work practice standards in this subpart. These standards apply at all times the affected unit is operating.

Work Practice Standards

- g. i. The Permittee shall conduct a tune-up of the process heater every two years as specified below.
 - (A) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may perform the burn inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown).
 - (B) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
 - (C) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);
 - (D) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject; and
 - (E) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- ii. Each biennial tune-up shall be conducted no more than 25 months after the previous tune-up.
- ii. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.
- iv. At all times, you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
- v. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in paragraph g are not met.

Energy Assessment Requirements

- h. The Permittee shall have a one-time energy assessment performed by a qualified energy assessor. The energy assessment must address the requirements in 40 CFR 63 Subpart DDDDD, Table 3, with the extent of the evaluation for items (a) to (e) in Table 3 appropriate for the on-site technical hours listed in 40 CFR 63.7575. [§63.7500(a)(1), Table 3] The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if these requirements are not met.

Recordkeeping Requirements

- i. The Permittee shall keep the following:
 - i. a copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status, or semiannual compliance report that has been submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
 - ii. maintain on-site and submit, if requested by the Administrator, an annual report containing the information in paragraphs (A) through (C) below:
 - (A) the concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the source;
 - (B) a description of any corrective actions taken as a part of the tune-up; and
 - (C) the type and amount of fuel used over the 12 months prior to the annual adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit; and

- iii. the associated records for paragraphs f through h.
- j. The Permittee shall:
 - i. maintain records in a form suitable and readily available for expeditious review;
 - ii. keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record; and
 - iii. keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee can keep the records offsite for the remaining 3 years.
- k. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if records are not maintained as described in paragraphs i and j.

Reporting Requirements

- l. The Permittee shall submit compliance reports to the DAQ on a 2-year basis. The first report shall cover the period beginning on the May 20, 2019 and ending on December 31, 2020. The first report shall be postmarked on or before January 30, 2021. Subsequent 2-year reports shall cover the periods from January 1 to December 31. The Permittee shall submit the subsequent compliance reports postmarked on or before January 30 for the previous 24-month period.
 - i. The compliance report must also be submitted electronically via the Compliance and Emissions Data Reporting Interface (CEDRI). CEDRI can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). You must use the appropriate electronic report in CEDRI for this subpart. Instead of using the electronic report in CEDRI for this subpart, you may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (<http://www.epa.gov/ttn/chief/cedri/index.html>), once the XML schema is available. If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §63.13. You must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI.
- m. The compliance report must contain the following information:
 - i. company name and address;
 - ii. process unit information, emissions limitations, and operating parameter limitations;
 - iii. date of report and beginning and ending dates of the reporting period;
 - iv. include the date of the most recent tune-up for each unit required according to paragraph g. Include the date of the most recent burner inspection if it was not done as scheduled and was delayed until the next scheduled or unscheduled unit shutdown; and
 - v. statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- n. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the reporting requirements in paragraphs l through m are not met.

6. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NESHAPS/MACT/112j – The Permittee is currently subject to several Maximum Achievable Control Technology Standards. National Emission Standards for Hazardous Air Pollutants from Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP). National Emission Standards for Hazardous Air Pollutants from Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM). National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ)

National Emission Standards for Hazardous Air Pollutants (NESHAP) from New and Existing Industrial, Commercial, and Institutional Boilers and Process Heaters at Major Sources under 40 CFR 63, Subpart DDDDD. The current permit includes the compliance, monitoring, recordkeeping and reporting requirements for this for 112(j) Case by Case MACT which expires May 19, 2019 and the MACT DDDDD requirements add during this renewal become effective on May 20, 2019.

There are no changes other than those discussed above to the requirements for this permit renewal and continued compliance is expected.

112(r) – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. A Compliance Assurance Monitoring Plan review was conducted as part of the renewal of the permit in 2011. In the review, it was determined that for the emission sources that were currently installed that a CAM plan was not required at that time. Since 2011, the facility has not modified or added any emission sources. The compliance assurance monitoring (CAM) rule requires owners and operators to conduct monitoring to provide a reasonable assurance of compliance with applicable requirements under the act. Monitoring focuses on emissions units that rely on pollution control device equipment to achieve compliance with applicable standards. An emission unit is subject to CAM, under 40 CFR Part 64, if all of the following three conditions are met:

- The unit is subject to any (non-exempt, e.g., pre-November 15, 1990, Section 111 or 112 standard) emission limitation or standard for the applicable regulated pollutant.
- The unit uses any control device to achieve compliance with any such emission limitation or standard.
- The unit's pre-control potential emission rate exceeds 100 percent of the amount required for a source to be classified as a major source; i.e., either 100 tpy (for criteria pollutants) or 10 tpy of any individual/25 tpy of any combination of HAP.

There were no modifications or additions of emission sources since the last CAM review therefore a CAM review is not needed at this time.

7. Facility Wide Air Toxics

Currently this facility has conditions for 02Q .0711 and 02D .1100. As part of the renewal the facility has requested that the toxics conditions and limits be removed. The majority of the permitted emission sources at TBB-Fairfield Road which emit toxic air pollutants are subject to a NESHAP (MACT). These sources are now exempt from NC air toxic rules in accordance with NC House Bill 952 and the conditions have been removed 02D .1100. As part of the renewal the facility has requested that the toxics conditions and limits be removed based on a review of annual emissions and previous modeling this change in the permit does not pose an unacceptable risk.

8. Facility Compliance Status/Compliance History:

The facility was last inspected by Robert Barker of the WSRO on December 14, 2017. Based on his observations and records review, the facility was found to be deficient for reporting requirements as defined in Section 3 – General Condition NN of the permit. A NOV was sent to the facility on March 8, 2018 for violation of General Condition 3 P for timely submittal of the Annual Compliance Certification. No outcome has been indicated in the record. An NOV was also issued for failure to change the oil and oil filter for the diesel-fired emergency generator which is required by 40 CFR Part 63 Subpart ZZZZ.

A compliance inspection was performed by Robert Barker of the WSRO on December 7, 2016 and appeared found to be in compliance.

A compliance inspection was performed by Robert Barker of the WSRO on December 16, 2015 and appeared found to be in compliance.

A compliance inspection was performed by Robert Barker of the WSRO on December 9, 2014 and appeared found to be in compliance.

A compliance inspection was performed by Robert Barker of the WSRO on March 26, 2014 and appeared found to be in compliance.

A compliance inspection was performed by Stephen Moser of the WSRO on May 9, 2013 and appeared found to be in compliance.

A compliance inspection was performed by Stephen Moser of the WSRO on August 21, 2012 and appeared found to be in compliance.

A NOV/NRE was issued by Stephen Moser of the WSRO for a violation of MACT PPPP failure to submit a timely report.

A NOV was issued by Steven Moser of WSRO on March 12, 2012 for violation of General Condition 3 P for timely submittal of the Annual Compliance Certification.

9. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. The State of Virginia and the Forsyth County Local Program are affected state/local program within 50 miles of the facility.

The following comments were received: **(TO BE COMPLETED AFTER PUBLIC and EPA COMMENT PERIOD.)**

10. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for the renewal application.

A consistency determination was not required for the renewal application.

WSRO recommends issuance of the permit and was sent a DRAFT permit prior to issuance. **(TO BE COMPLETED AFTER REGIONAL COMMENTS ARE RECEIVED)**

RCO concurs with WSRO's recommendation to issue the renewed air permit. **(TO BE COMPLETED AFTER PUBLIC and EPA COMMENT PERIOD.)**